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Attorney for Defendant
SHAHROKH MAJDI

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	CASE NO: CR-S-04-0130 GEB
)	
Plaintiff,)	STIPULATION AND ORDER TO
)	CONTINUE STATUS DATE UNDER
)	SPEEDY TRIAL ACT; [PROPOSED]
v.)	ORDER
)	
SHAHROKH MAJDI, et al.)	CURRENT TRIAL STATUS DATE:
)	JUNE 24, 2005, 9:00 AM
)	
Defendant.)	PROPOSED NEW STATUS DATE:
)	OCTOBER 21, 2005, 9:00 AM
)	
)	

Defendant, Shahrokh Majdi, through his counsel of record, Robert M. Bernstein, and the United States of America, through its counsel of record, Assistant United States Attorney, Daniel S. Linhardt, hereby stipulate to and request an order to continue the date of the status hearing from June 24, 2005, at 9:00 a.m. until October 21, 2005, at 9:00 a.m., based on the following facts:

1. This case is currently scheduled for a status hearing on June 24, 2005, at 9:00 a.m.

2. Plea negotiations have been unsuccessful and the parties anticipate proceeding to trial. However, the Defense has yet to receive any discovery. Both parties agree that this brief continuance is necessary to ensure that the Defense has

1 sufficient time to receive and review the numerous documents,
2 witness interviews, notes, and reports related to this case.

3 3. Both parties agree that the ends of justice are served by
4 granting this brief continuance. Both parties agree that the ends
5 of justice served by granting such a continuance outweigh the best
6 interests of the public and defendant in a trial status conference
7 being held on June 24, 2005.

8 4. Pursuant to 18 U.S.C. § 3161(h) (8) (A), the ends of
9 justice served by granting such a continuance outweigh the best
10 interest of the public and the defendant in a trial date being
11 set at the status conference now scheduled for June 24, 2005.
12 Such a continuance will provide the Defense with the time
13 necessary to review the yet to be received discovery.

14 5. Based on the foregoing, the parties agree that, for the
15 purpose of computing time under the Speedy Trial Act within which
16 trial must commence, the time period of June 24, 2005, until October
17 21, 2005, constitutes excludable time under the Speedy Trial Act
18 pursuant to 18 U.S.C. §3161(h) (8) (A) .

19
20 Dated: June 13, 2005

Respectfully submitted,

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22 S/Robert M. Bernstein

23 _____
24 ROBERT M. BERNSTEIN
25 Attorney for Defendant
SHAHROKH MAJDI

26 Dated: June 13, 2005

S/Daniel S. Linhardt

27 _____
28 DANIEL S. LINHARDT
ASSISTANT U.S. ATTORNEY

ORDER

____GOOD CAUSE HAVING BEEN SHOWN: IT IS SO FOUND AND ORDERED:
That the trial setting conference currently scheduled for June 24,
2005 at 9:00 A.M. before the Honorable Garland E. Burrell be continued
until October 21, 2005 at 9:00 a.m..

Dated: June 14, 2005

/s/ Garland E. Burrell, Jr.
GARLAND E. BURRELL, JR.
United States District Judge